

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS--EASTERN DIVISION**

LABORERS' PENSION FUND, et al.,

Plaintiffs,

V.

**PAN-OCEANIC ENGINEERING CO., et
al.**

Defendants.

Case No. 10 CV 7104

Judge William J. Hibbler

Magistrate Judge Kim

**DEFENDANTS' PAN-OCEANIC ENGINEERING COMPANY, INC., et al.'s
INITIAL DISCLOSURE STATEMENT**

Defendants, Pan-Oceanic Engineering Company, Inc., N.K. Contracting & Equipment Company, Inc., and JDS Contracting & Equipment, LLC, by their attorneys, present the following initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(A).

1. Pursuant to FRCP 26(a)(1)(A)(i), the following individuals may have information relevant to the disputed facts:

Jasdeep Singh
JDS Contracting & Equipment, LLC
255 Bunting Lane
Bloomington, Illinois 61708

Narinder K. Singh
N.K. Contracting & Equipment Co., Inc.
255 Bunting Lane
Bloomington, Illinois 60108

Darius Tossiede
Pan-Oceanic Engineering Co., Inc.
8501 W. Higgins, Suite 630
Chicago, Illinois 60631

Gulzar Singh
Pan-Oceanic Engineering Co., Inc.
8501 W. Higgins, Suite 630
Chicago, Illinois 60631

2. Pursuant to FRCP 26(a)(1)(A)(iii), defendants previously produced Form 1096 Annual Summary and Transmittals of U.S. Information Returns for JDS Contracting & Equipment, LLC and N.K. Contracting & Equipment Co., Inc. to the plaintiffs.

3. Pursuant to FRCP 26(a)(1)(A), defendants deny that plaintiffs incurred any damages as a result of defendants' conduct.

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PAN-OCEANIC ENGINEERING CO.,
INC., JDS CONTRACTING &
EQUIPMENT, LLC, and N.K.
CONTRACTING & EQUIPMENT CO.,
INC.

By: _____
One of their attorneys